

REMARKS/ARGUMENTS

Claims 32-43 are pending in the application. Claims 32, 34, 38-39 and 41-43 have been amended. No new matter has been added. Reconsideration of the claims is respectfully requested.

In paragraph 11 on page 5 of the Office Action, claims 32-43 are rejected under 35 U.S.C. § 112 first paragraph for failing to comply with the written description requirement. These claims contain subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor, at the time the application was filed, had possession of the claimed invention.

In paragraph 7 on page 3 of the Office Action, claims 32-38 and 40-43 are rejected under 35 U.S.C. §102 (e) as being anticipated by Riley (US Patent No. 6685228).

In paragraph 9 on page 4 of the Office Action, claim 39 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Riley.

The present claims are rejected under 35 USC sec 102 on the basis of the Riley Patent 6685228.

It is respectfully submitted that the Riley reference is not prior art. In support of our position is a declaration under 37 CFR 1.131 declaring, invention, reduction to practice and diligence before the filing date of the Riley patent application.

With respect to the rejection on 35 USC sec 112 first paragraph, amendment has been made to the claims to remove the objected to language. It is strongly submitted that the drawings fully support the suggested language, but for simplicity, the terminology has been removed and words supported by the specification are used. The patentability of the claimed invention is unaffected as the scope has not been changed.

In view of the forgoing, it is submitted that this application is now in condition for allowance. Applicant respectfully requests favorable reconsideration and early allowance of all pending claims.

If a telephone conference would be helpful in resolving any issues concerning this communication, please contact Applicant's attorney of record, Michael B. Lasky at (952) 253-4106.

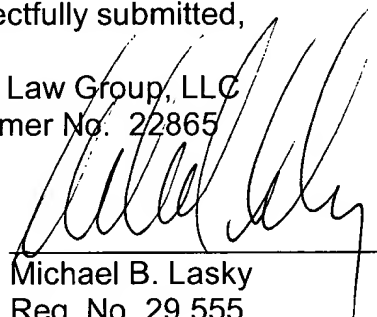
Respectfully submitted,

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Date:

6 October 2006

By:



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